

FILED

FEB 13 2024

BONNIE HACKLER  
Clerk, U.S. District Court

By Deputy Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

JORDAN FRANCIS TOYNE,

*Defendant.*

SEALED

Case No. **24 CR - 24 RAW**

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

**SEXUAL ABUSE OF A MINOR IN INDIAN COUNTRY**  
**[18 U.S.C. §§ 2243(a), 2246(2)(A), 1151, & 1152]**

Between in or about January, 2019, and in or about October, 2022, within the Eastern District of Oklahoma, in Indian country, the defendant, **JORDAN FRANCIS TOYNE**, a non-Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: penetration, however slight, between the penis of the defendant and the vulva of Victim, an Indian, who had attained the age of 12 years, but had not attained the age of 16 years, and who was at least four years younger than the defendant, in violation of Title 18, United States Code, Sections 2243(a) & 2246(2)(A), 1151, & 1152.

COUNT TWO

**SEXUAL ABUSE OF A MINOR IN INDIAN COUNTRY**  
**[18 U.S.C. §§ 2243(a), 2246(2)(B), 1151, & 1152]**

Between in or about January, 2019, and in or about October, 2022, within the Eastern District of Oklahoma, in Indian country, the defendant, **JORDAN FRANCIS TOYNE**, a non-

Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: contact between the mouth of the defendant and the vagina of Victim, an Indian, who had attained the age of 12 years, but had not attained the age of 16 years, and who was at least four years younger than the defendant, in violation of Title 18, United States Code, Sections 2243(a), 2246(2)(B), 1151, and 1152.

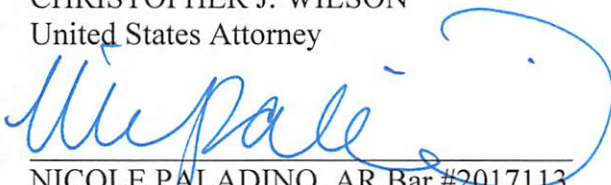
**COUNT THREE**

**SEXUAL ABUSE OF A MINOR IN INDIAN COUNTRY  
[18 U.S.C. §§ 2243(a), 2246(2)(D), 1151, & 1152]**

Between in or about January, 2019, and in or about October, 2022, within the Eastern District of Oklahoma, in Indian country, the defendant, **JORDAN FRANCIS TOYNE**, a non-Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: the intentional touching, not through the clothing, of the genitalia of Victim, an Indian, who had attained the age of 12 years, but had not attained the age of 16 years, and who was at least four years younger than the defendant, with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person, in violation of Title 18, United States Code, Sections 2243(a), 2246(2)(D), 1151, and 1152.

A TRUE BILL:

CHRISTOPHER J. WILSON  
United States Attorney

  
\_\_\_\_\_  
NICOLE PALADINO, AR Bar #2017113  
Assistant United States Attorney

Pursuant to the E-Government Act,  
the original indictment has been filed  
under seal in the Clerk's Office.

s / Foreperson  
**FOREPERSON OF THE GRAND JURY**